

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DR. MARK CHRYSTAL, et al.,	)	Case No. 2:19-cv-05272
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	

**DEFENDANT THE OHIO STATE UNIVERSITY’S RESPONSE TO PLAINTIFFS’  
MOTION FOR LEAVE OF COURT TO FILE *EX PARTE* DOCUMENT UNDER SEAL**

Defendant The Ohio State University (“Ohio State”) does not oppose Plaintiffs’ Motion for Leave of Court to File *Ex Parte* Document Under Seal, Doc. 14, and does not oppose the anonymity of the John Doe plaintiffs in principle. Ohio State believes, however, that such continued anonymity should be granted only in a manner identical to that approved by the Court in related cases. *See* Case No. 2:18-cv-00692 (“*Garrett*”), Doc. 67; Case No. 2:18-cv-00736 (“*Snyder-Hill*”), Doc. 49; Case No. 2:19-cv-01911 (“*John Doe M.B.*”), Doc. 28; Case No. 2:19-cv-02237, (“*DiSabato*”), Doc. 26; Case No. 2:19-cv-03165 (“*John Does 37-66*”), Doc. 18; Case No. 2:19-cv-04433 (“*John Doe*”), Doc. 12; Case No. 2:19-cv-04397 (“*John Does 67-87*”), Doc. 12; Case No. 2:19-cv-04624 (“*John Does 88-94*”), Doc. 13; and Case No. 2:19-cv-04634 (“*Beaudin*”), Doc. 10.

Counsel for Ohio State conferred with plaintiffs’ counsel in the above-captioned matter, and the parties are in agreement with the attached proposed Order. It is consistent with the above-referenced Orders, with the exception of the following changes:<sup>1</sup>

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<sup>1</sup> The more recent Orders in the *John Doe M.B.*, *DiSabato*, *John Does 37-66*, *John Doe*, *John Does 67-87*, *John Does 88-94*, and *Beaudin* cases contain certain changes to Ohio State personnel and titles from the earlier *Garrett* and *Snyder-Hill* Orders.

- 1) Christopher M. Culley is no longer listed as a person at Ohio State to whom the identities of the John Doe plaintiffs may be disclosed. Mr. Culley is no longer employed at Ohio State.
- 2) Katherine M. Lasher, Associate Vice President, Office of Institutional Equity, The Ohio State University, is listed as a person at Ohio State to whom the identities of the John Doe plaintiffs may be disclosed.
- 3) Anne Garcia's title has changed.

DAVID A. YOST  
ATTORNEY GENERAL OF OHIO

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Special Counsel for Defendant  
The Ohio State University

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically on December 16, 2019. Notice was sent by operation of the Court's electronic filing system to all other counsel who have entered an appearance and any parties who have entered an appearance through counsel. The parties may access this filing through the Court's ECF system.

/s/ Michael H. Carpenter

Trial Attorney for

Defendant The Ohio State University